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MEMO ENDORSED October 30, 2015

BY ECF

Honorable P. Kevin Castel
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

*A habeas
Granted
SO ORDERED
JPM/USD
10-30-15*

Re: United States v. Jason Galanis, et al.
USDC, Southern District of New York Case No. 15 CR 643 (PKC)

Dear Judge Castel:

The undersigned represents defendant Jason Galanis in connection with the above-referenced action. We write, with the Government's consent, to respectfully request a ten (10) day extension from October 30, 2015 to November 9, 2015 for Jason Galanis to meet his bail conditions.

Our first request of October 16, 2015 sought an extension until October 30, 2015 [Dkt. No. 41]. Since that time (as well as beforehand), Jason Galanis and his counsel have made substantial good faith efforts to identify four financially responsible bail signatories and property with which to secure Jason Galanis' bond. Three of the four signatories have been identified and interviewed. One signatory fell through, and we are currently identifying another to fulfill this role. The property has also been identified, but it has taken longer than expected to execute the necessary documents to pledge as security.

Thus, with the consent of the Government, we respectfully request that Your Honor extend the deadline for Jason Galanis to meet his bail conditions until November 9, 2015. Should Your Honor have any questions with respect to this application, please do not hesitate to contact me.

Respectfully submitted,

Thomas P. Mazzucco
Thomas P. Mazzucco

cc: Assistant United States Attorney Brian Blais (*via email*)